

1909-045 Chancery Causes: George Z. Parsons vs. Alice Parsons
Lee Co.

Bailey, Clem

CA-Divorce
T-Migration
Vices

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George Z.Parsons,Complnt. #
Vs. #
Alice Parsons,Deft. #
=====#

Bill for Divorce.

To the Hon.H.A.W.Skeen,Judge of the Circuit Court for Lee Co.

Humbly complaining,your orator,George Z.Parsons,a citizen of Lee County,Virginia,respectfully represents unto your honor,and charges that he and Alice Bailey,on or about the _____ day of _____,1908,in Harlan County,Ky.,were duly married to each other;that after their marriage,house kept and lived together as man and wife,in this county,hapily,until a few days ago,to the great surprise and shagrin of your orator,he learned that his said wife had become untrue to him;that on the _____ day of July, and divers other days and times, 1909,his said wife,in this county,at their dwelling house,and around and about their premises,without the consent,procurement and connivance of your orator,committed the crime and act of adultery, by having carnal and sexual intercourse with one _____ on the day Clem;that ~~after~~ your orator learned of her said infidelity and adulterous acts,and,had accosted her about the matter,she left your orator's home,saying she was going to Harlan County,Ky.,and your orator is advised,charges and believes,she went away with the said Clem.

Your orator further charges and alleges that since he had information of the adulterous acts aforesaid of his said wife,he had not lived with her,nor in any way condoned her said offense;that he is now and has been for more than a year previous to the institution of this suit been domiciled in and a citizen of Lee County, Virginia,and that they last cohabited together as man and wife in this county;that it is probable that his said wife will not come back to this State;that she will remain out of this State where she can be with her said paramour,- he being ^a resident and citizen of Harlan County,Ky.,as your orator is informed.

The premises aforesaid considered,your orator is advised that he ^{by} is law entitled to have an absolute divorce from his said wife,

a divorce a vinculo matrimonii from her, but only a court of chancery has jurisdiction to hear and award; and to that end he prays your honor to take cognizance of this his cause of complaint; that the said Alice Parsons be made a party defendant to this bill of complaint; that she be required to answer this bill, but she need not do so on oath as that is waived; that in case she has become a non-resident of this State, or absents herself so that process herein can not be served upon her, an order of publication be made and posted for her as required by law; that upon a final hearing of this cause, a divorce a vinculo matrimonii be awarded and granted your orator for ever dissolving the bonds of matrimony now existing between him and the said Alice. And that all other, further and general relief be granted your orator that the nature of his cause may require to conform to good conscience and equity. And he will ever pray, etc.

Pennington Bros. P.Q.

E.W.PENNINGTON.

ROBT. L. PENNINGTON.

Pennington Bros.

ATTORNEYS AT LAW,

JONESTOWN AND PENNINGTON GAP, VA.

Pennington Gap, Va., 8/10/1909.

Mr. H. C. T. Ewing,
Jonesville, Va.

Dear Tip:-

I phoned you to day through Capt. Joslyn the following Memorandum: George Z. Parsons Vs. Alace Parsons. Spa. In Chancery, to the 2nd Aug. Rules, 1909" . Told Capt. Joslyn to tell you, I would send you writ tax to-night; so I herewith enclose you my check for \$1.50 to pay the writ tax on this suit. If you have not done so, send the process to Elbert Stapleton.

Yours very truly,
E. W. Pennington.

P.S.

I enclose you the bill in this case, which file.

Gen Z. Parsons

Allen^{Dr.} Parsons
Spa in Chaucy to the
2^d Aug Bunk 1909.

I Ben Bess
send to Stapleton Wright

The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

WE COMMAND YOU, That you summon *Alice Parsons*

to appear at the Clerk's office of the Circuit Court of the County of Lee, at rules to be held for the said court, on
the *3rd* Monday in *August*, 190*9*, to answer a bill in chancery exhibited against *him*
in our said court by George J. Parsons

And have then there this writ. Witness, H. C. T. EWING, Clerk of our said Court, at the court-house, the *10th*
day of *August*, 190*9*, and 1*34th* year of the Commonwealth.

A Copy, Teste:

H. C. T. Ewing, Clerk

H. C. T. Ewing, Clerk

VS

{

SUBPOENA
IN
CHANCERY

-----p. q.

To-----

Rules ;

-----Court

The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

WE COMMAND YOU, That you summon *Alice Parsons*

to appear at the Clerk's office of the Circuit Court of the County of Lee, at rules to be held for the said court, on the *3rd* Monday in *August*, 190*9*, to answer a bill in chancery exhibited against *him* in our said court by *George Z. Parsons*

And have then there this writ. Witness, H. C. T. EWING, Clerk of our said Court, at the court-house, the *10th* day of *August*, 190*9*, and 1*34th* year of the Commonwealth.

A Copy, Teste:

H. C. T. Ewing, Clerk

_____, Clerk

Not executed the power not paid
Sept the amount of this
August 16. 1909
E. S. Stapleton & S. has
Wm. J. Tucker S. J. C.

George Z. Parsons

VS

SUBPENA
IN
CHANCERY

Allen Parsons

Pennington Bros. p. q.

To Second Aug Rules
Lee Vincent Court

1909

The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

again
WE

COMMAND YOU, That you summon

Alice Parsons

to appear at the Clerk's office of the Circuit Court of the County of Lee, at rules to be held for the said court, on
the *1st* Monday in *October*, 190*9*, to answer a bill in chancery exhibited against *her*

in our said Court by George G. Parsons

And have then there this writ. Witness, H. C. T. EWING, Clerk of our said Court, at the court-house, the *19th*
day of *Aug*, 190*9*, and 1*34* year of the Commonwealth.

A Copy, Teste:

H. C. T. Ewing, Clerk

_____, Clerk

Geo. G. Parsons

VS

SUBPOENA
IN
CHANCERY

Alice Parsons

Pen. Bros., p. q.

To 1st October Rules

Lee Circuit Court

1909.
Executed on the 24th
day of August, 1909
by delivering a true
copy of the Subpoena
to Alice Parsons
in Du Santee, Va.

E. S. Tucker at S. Va.
Wm. Tucker
S. L. Co.